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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14 JAMES BROWN,

15 Plaintiff,

16 v.

17 STATE FARM MUTUAL AUTOMOBILE
18 INSURANCE COMPANY; and DOES 1
through 25, inclusive,

19 Defendants.
20

CASE NO. C07-02743 PJH

**THE PARTIES' JOINT STIPULATED
ADMINISTRATIVE MOTION TO
CONTINUE THE DISPOSITIVE
MOTION DEADLINE**

21
22 The parties to the above-entitled action hereby respectfully submit their Joint Stipulated
23 Administrative Motion to Continue the Deadline to Hear Dispositive Motions pursuant to Judge
24 Hamilton's Pretrial Instructions and Civil L.R. 7-11.

25 1. The parties have been working diligently toward moving this case forward in an
26 efficient, expeditious manner and have exchanged written discovery and responses and commenced
27 deposition discovery;

28 2. The parties previously stipulated to continue the deadline to hear dispositive

1 motions, which the Court granted, in order to allow plaintiff to take certain depositions;

2 3. State Farm has been attempting to locate and depose two witnesses regarding the
3 alleged customization to the motorcycle, which is the central issue of this case; (1) Jini Baum,
4 former Service Advisor at Bob Dron Harley Davidson, and (2) Eric Dobinson of A to Z Appraisers.
5 State Farm has thus far been unable to locate Mr. Baum and Mr. Dobinson appears to be evading
6 service. State Farm does not anticipate being able to complete those depositions before the current
7 deadline to file its Motion for Summary Judgment, which is August 27, 2008;

8 4. Therefore, the parties hereby jointly stipulate to and request that the Court extend the
9 deadline to hear dispositive motions from October 1, 2008 to December 3, 2008.

10
11 Dated: August 15, 2008

LAW OFFICES OF JOHN T. BELL

12
13 By 

14 JOHN T. BELL
Attorneys for Plaintiff
JAMES BROWN

15
16 Dated: August 15 2008

HAYES DAVIS BONINO ELLINGSON
McLAIN & SCOTT, LLP

17
18
19 By 

20 STEPHEN M. HAYES
STEPHEN P. ELLINGSON
JAMIE A. RADACK
Attorneys for Defendant
STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY

[PROPOSED] ORDER

IT IS SO ORDERED:

Pursuant to the joint motion of the parties, the deadline to hear dispositive motions shall be continued to December 3, 2008.

Dated: _____, 2008

HONORABLE PHYLLIS HAMILTON
UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF
CALIFORNIA